



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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MAY 11 2015

Ref: 8EPR-N

Katie Stevens, Field Manager
Bureau of Land Management
Grand Junction Field Office
2815 H Road
Grand Junction, Colorado 81506

Re: Grand Junction Field Office Final Resource Management Plan and Environmental Impact Statement CEQ # 20150101

Dear Ms. Stevens:

The U.S. Environmental Protection Agency Region 8 has reviewed the Bureau of Land Management (BLM) Grand Junction Field Office (GJFO) Final Resource Management Plan (RMP) and Final Environmental Impact Statement (EIS). The EPA provides these comments to assist with development of the BLM's RMP/EIS and in accordance with our authorities and responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act.

Background

The GJFO planning area includes approximately 2.2 million acres of BLM, U.S. Forest Service (FS), U.S. Bureau of Reclamation (BOR), state and private lands in western Colorado's Garfield, Mesa, Montrose and Rio Blanco Counties. There are nearly 1.1 million acres of BLM administered public lands and 1.2 million acres of federal mineral estate in the planning area. The approved RMP will replace the 1987 Grand Junction RMP, as amended, and will guide management of public lands administered by the GJFO.

Alternatives analyzed in the Final EIS include: Alternative A (No Action Alternative), Alternative B (Proposed RMP/Final EIS), Alternative C (emphasizing non-consumptive use and management of resources while providing for multiple use) and Alternative D (emphasizing active management for natural resources, commodity production and public use opportunities). The Preferred Alternative identified in the Draft EIS was revised as the result of substantive comments received, and is now identified as the Proposed RMP (Alternative B). It includes elements of all alternatives analyzed in the Draft EIS. Alternative B identifies approximately 790,700 acres of BLM federal minerals open to fluid mineral leasing and geophysical exploration. This includes 371,500 acres subject to no surface occupancy (NSO) stipulations, 481,800 acres subject to controlled surface use (CSU) stipulations, and 332,400 acres subject to timing limitations (TLs). The reasonably foreseeable development (RFD) for the planning area identifies for all mineral ownership lands in the study area, the baseline scenario would result in the drilling of an estimated 9,116 wells.

The EPA's June 21, 2013 comments on the Draft EIS focused on air resources, surface water resources, groundwater resources, public drinking water supply sources and water management/water resource monitoring. These comments have been largely addressed and/or answered to our satisfaction in the Final EIS through comment responses and additions/revisions to the following sections of the NEPA document: Chapter 2, Alternatives; Chapter 3, Affected Environment; Chapter 4, Environmental Consequences; Appendix B, Stipulations Applicable to Fluid Mineral Leasing and Other Surface-Disturbing Activities; and Appendix G, Comprehensive Air Resources Protection Protocol. With the expanded discussion and additional information, the Final EIS provides improved disclosure and mitigation of potential impacts to water and air resources.

Protection of Water Resources

Water Resource Monitoring

The EPA appreciates the description of the new Colorado Oil and Gas Conservation Commission (COGCC) Rule 609 in the Final EIS. This COGCC rule for statewide groundwater baseline sampling and monitoring requires operators to collect baseline water quality samples at two different groundwater sources within 0.5 mile of the well site before drilling any new oil or gas well. We continue to encourage the BLM to develop a plan describing how water quality monitoring in the planning area will occur prior to, during, and after anticipated development to detect impacts to surface water as well as groundwater. As an example, the White River Field Office (WRFO) RMP Amendment Final EIS included a water resource monitoring plan (Appendix I) as part of their NEPA analysis to document current conditions and identify future water resources data collection, management and information gathering strategies for implementing the decisions in the RMP amendment. This plan describes baseline data collected, reports completed, and outlines the authority, policy, and methods the WRFO uses to manage oil and gas activities that have the potential to impact both groundwater and surface water resources.

Protection of Air Resources

Potential Impacts to Ozone

The Colorado Air Resources Management Modeling Study (CARMMS) far-field air quality analysis included in the Final EIS presents a summary of the reasonably foreseeable development (RFD) high scenario for oil and gas development for the planning area. However, a summary of the final CARMMS report from January 2015, which includes the low and medium scenarios, is not included. The results from the CARMMS high scenario disclose significant potential ozone impacts from anticipated project emissions within the planning area indicating that Year 2021 federal oil and gas maximum 4th high daily 8-hour ozone contributions may be as high as 4.4 parts per billion (ppb). We consider this level of ozone increase as significant for the planning area. Without results from the medium and low CARMMS scenarios, we are unable to compare impacts between all possible levels of development (low, medium and high) or alternatives. Because of this and the uncertainty in the model results, the EPA sees a benefit in identifying and possibly requiring emission reduction strategies (mitigation measures) at the RMP stage. We recommend the BLM consider identifying mitigation measures from Table VI-I Best Management Practices and Air Emission Reduction Strategies for Oil and Gas Development in the BLM's Comprehensive Air Resource Protection Protocol (CARPP) that may be necessary in the future. The process outlined in the BLM's CARPP will be essential to protect air quality and air quality related

values (AQRVs) within the GJFO planning area. We look forward to participating in project level air quality analyses that falls under this planning level EIS when they are initiated through the CARPP.

Near-field Modeling

We note that the Final EIS has been updated to include near-field modeling conducted for two Environmental Assessments (EAs) within the planning area (Fram Whitewater Master Development Plan EA and Black Hills DeBeque Exploratory Proposal EA). The Final EIS references these EAs, but does not disclose the near-field modeling impacts identified in these EAs. In addition, there are aspects of the modeling conducted for these EAs that do not appear to conform to EPA guidance for near-field modeling. The EPA was not consulted on the use of these previous modeling efforts prior to the release of the Final EIS. The CARPP indicates (Section II.A and Section III.C.2) that EPA and other MOU agencies will be included in the development of an analysis such as the one presented for near-field impacts in this Final EIS; however, that has not occurred. If near-field modeling will be conducted or tiered to for an oil and gas EIS, it is important that the BLM include those analyses as appendices and summarize the model setup and modeled impacts in the NEPA document. If the BLM develops other near-field analysis tools for projects in the future that would be covered by this planning level EIS, we request the BLM work with the EPA and other signatory agencies as per the *Memorandum of Understanding Among the U.S. Department of Agriculture, U.S. Department of the Interior, and U.S. Environmental Protection Agency, Regarding Air Quality Analyses and Mitigation for Federal Oil and Gas Decisions Through the NEPA Process* (June 23, 2011).

Greenhouse Gas Emissions and Climate Change

We appreciate the summary discussion of climate change in the Final EIS, Chapter 3, as well as the inclusion of the greenhouse gas (GHG) emission inventories for each of the alternatives in Chapter 4. We believe that the Council on Environmental Quality's (CEQ) December 2014 Revised Draft Guidance for Federal Agencies' Consideration of GHG Emissions and Climate Change offers a reasonable approach for conducting analyses of GHGs and climate change impacts. The Final EIS compares the GHG emissions to Colorado statewide emissions and total U.S. emissions. We believe this approach does not provide meaningful information for a project level analysis and instead recommend that the NEPA analyses consider providing a frame of reference, such as an applicable Federal, state, tribal or local goal for GHG emission reductions, and discuss whether the emissions levels are consistent with such goals.

We note the Final EIS indicates that it is not possible to distinguish the impacts on global climate change GHGs originating from the planning area. We recommend the BLM utilize the estimated GHG emissions as a reasonable proxy for climate change impacts when comparing the proposal and alternatives. In disclosing the potential impacts of the proposal and alternatives, consideration should be given to whether and to what extent the impacts may be exacerbated by expected climate change in the action area as discussed in the "affected environment" section.

Lastly, we recommend that the BLM identify and commit to implementation of reasonable measures to reduce GHG emissions associated with the RMP, including reasonable alternatives or other practicable mitigation opportunities, and disclose the estimated GHG reductions associated with such measures in the ROD. Such measures could include consideration of renewable energy resources to address energy

needs for compressor stations and other facilities. The analysis should, as appropriate, consider practicable changes to the RMP to make it more resilient to anticipated climate change.

Closing

We appreciate the opportunity to review the Final EIS. If you have any questions or requests, please feel free to contact either me at 303-312-6704 or David Fronczak of my staff at 303-312-6096 or by email at fronczak.david@epa.gov.

Sincerely,



Philip S. Strobel
Acting Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation

